

Certification of CPNI filing dated February 2, 2006

WC docket No. 05-196

For:

B&S Telecom, Inc.
5850 Dixie Highway
Clarkston, Mi. 48346

B&S TELECOM, INC's
CERTIFICATE OF COMPLIANCE WITH FCC CPNI RULES,
BEING TITLE 47 sec. 64.2009(e), et. seq.
For the calendar year 2006

NOW COMES B&S Telecom, Inc., a Michigan Corporation, by and through Bruce H. Yuille, its president and agent and hereby certifies and affirms that he has personal knowledge that said company has established operating procedures that are adequate to ensure ongoing compliance with the rules of subpart U- Customer Proprietary Network Information during the calendar year 2006, which are contained in Title 47, sec 64.2001 et. seq.

A further statement outlining Quick's procedures in place is attached as *Exhibit A*, as required by 47 C.F.R. 64.2009(e).

That this Certification is effective for the period between January 1, 2006 to December 31, 2006

Signed December 28, 2005.

Bruce H. Yuille, President

B&S Telecom, Inc.
5850 Dixie Highway
Clarkston, Mi 48346
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Exhibit "A"
To Certificate of Compliance with FCC CPNI Rules
Title 47. sec. 64.2001 et. Seq.
STATEMENT CONCERNING COMPLIANCE
For calendar year 2006

NOW COMES Bruce H. Yuille, President of B&S Telecom, Inc. and on personal knowledge states the following:

1. He has read Title 47, sections 64.2001 through and including section 64.2009 and the following policies and procedures are in place to assure continued compliance with same during calendar year 2006.
2. Every employee signs a confidentiality and non-disclosure agreement as a condition of their employment. Unauthorized release of our CPNI information is a violation of such agreement and would trigger dismissal. No such action has been found necessary to date.
3. B&S never has not and does not intend to engage in any direct or indirect marketing programs to its embedded customer base, or to any of its former customers, and therefore does not access CPNI for such purposes. Therefore B&S's system to determine when its employees can or can not access CPNI for marketing purposes is simple; it is never to be done.
4. B&S CPNI data is safe and secure because: All such CPNI data is located on a single server, behind a NAT and a firewall that is monitored for intrusion detection and failed access attempts 24 hours a day, 7 days a week by a third party vendor. Such data is user name and password protected and known only to its IT staff or contractors. Such CPNI is contained in a proprietary software custom SQL database. B&S does not have any executable programs to data mine our CPNI for marketing purposes that could be executed by any non IT personnel. Only an IT staff member or a third party vendor under contract could write the code necessary to mine the CPNI data and they would not do so without my advance approval.

5. Since B&S does/has not engage(d) in marketing campaigns to its existing customer base using CPNI, Quick's record of same is a blank sheet of typewriter paper.
6. All customers who call in to make inquiries are asked for the customer contact name or the exact name on the account to validate that we are speaking to an authorized representative of the specific customer before the discussion proceeds further. To further assure that Quick only deals with an actual customer in contact calls, no changes in the customer's service and their CPNI are made without confirming email or fax.
7. B&S does not use, disclose or permit access to CPNI to identify or track its customer's calls to competing service providers.
8. B&S has never sought to use any opt-out mechanisms and therefore has never found it necessary to issue any letters or notices to the Commission or any other party concerning same not working.

Signed December 28, 2005.

Bruce H. Yuille, President
B&S Telecom, Inc.